

**BEFORE THE POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001**

Postal Rate Commission
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Postal Rate and Fee Changes, 2006

Docket No. R2006-1

**INTERROGATORIES AND REQUESTS FOR PRODUCTION
OF DOCUMENTS OF PITNEY BOWES INC. TO UNITED STATES
POSTAL SERVICE WITNESS JAMES M. KIEFER
(PB/USPS-T37-1)**

Pursuant to Rules 25 through 28 of the Rules of Practice of the Postal Rate Commission, Pitney Bowes Inc. ("Pitney Bowes") directs the following interrogatories and requests for production of documents to United States Postal Service Witness James M. Kiefer. If the witness cannot answer a question or subpart, we request that the Postal Service answer through another witness or submit an institutional response.

Respectfully submitted,

/s/

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Counsel to PITNEY BOWES INC.

DATED: June 20, 2006

PB/USPS-T37-1. Please confirm that the Postal Service's current and proposed rate design for Parcel Select provides dropship discounts. If you cannot confirm fully, please explain fully.